

**UNITED STATES DISTRICT
COURT SOUTHERN DISTRICT OF
TEXAS HOUSTON DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACK STEPHEN PURSLEY,

Defendant.

Case 4:18-cr-00575

DEFENDANT'S THIRD AMENDED EXHIBIT LIST

PRESIDING JUDGE: Judge Lynn N. Hughes		PLAINTIFF'S ATTORNEYS: Grace Albinson, Sean Beaty, and Jack Morgan		DEFENDANT'S ATTORNEYS: Victor Vital, Alicia Raines Barrs, and Nicole LeBoeuf	
TRIAL DATE: 09/03/2019		COURT REPORTER:		COURTROOM DEPUTY:	

DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
1				12/19/12	Email from Mooney to ddial@wwwgd.com	MA_00037537-00037539
2				05/19/14	Executive Summary to IRS CI by Counsel for Shaun P. Mooney	Mooney-000695-Mooney-000698
3				09/22/14	OVDP	IRS-001725 – IRS-001944
4				08/26/13	Email from Shaun Mooney from Andrew Mellor	BL-FILE 2-000111
5				11/05/08	Letter from Shaun Mooney to Nigel Tibey	BL- IOMFTL FILE 2-000206 – BL- IOMFTL FILE 2-000220
6				05/19/09	Gillis email to Coughtrey re new matter	Gillis_00022122-Gillis 00022127
7				12/03/14	Shaun Mooney v. Charles Gillis and Gillis, Paris, Henrich, PLLC	Gillis_0000083-Gillis_0000085
8				01/04/13	IRGP v. Mooney, Original Petition	Civ-Lit 000139-000148
9				05/03/13	IRGP Settlement Agreement and Mutual Release	MA_00037564-00037591
10					INTENTIONALLY LEFT BLANK	
11					INTENTIONALLY LEFT BLANK	
12					Shaun Mooney business card	MA_00037543
13					Mooney Affidavit	CIV-LIT-000246 – CIV-LIT-000249
14				04/10/18	Gillis Letter of Non-Prosecution (executed by Davis)	MA_00037592 – MA_00037594
15				06/30/09	Email from Mooney to Gillis	IRGP0001367 – IRGP0001368
16				00/00/07 – 00/00/08	Stock Transfer Sheets	Gillis_0052995 – Gillis_0052998
17					Work assigned/status	
18				08/14/13	Email from Michael Coughtrey to Charles Gillis August 14, 2013	Gillis_00048546 – Gillis 00048548

DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
19					Pursley Individual Master File	IRS-0005044 – IRS-0005072
20				02/23/17	2017 Check from Minns to U.S. Treasury	IRS-002575
21					2014 IRS refund check	MA_00037561
22					2015 IRS refund check	MA_00037562
23					2016 IRS refund check	MA_00037563
24					Picture of Pursley Family	MA_00038603
25					Ron Braver, CV	MA_00038591-38398
26					Stephen Grace, CV	MA_00038540-00038565
27					Fred Gavin CV	MA_00037287-MA_00037293
28				07/21/11	Form 484 Change to Company Details – APHC	MA_00006678 – MA_00006679
29				09/01/09	APHC Share Certificate No. 2	MA_00006623-MA_00006637
30				06/30/10	APHC Financial Report YE June 30 2010	Gillis_00029792 - Gillis_00029800
31				01/25/16	Email from Gillis to Dan Cogdell	Gillis_0003558 - Gillis_0003560
32				03/04/09	Corporate Meeting Summary	CIV-LIT-000303- CIV-LIT-000307
33				01/19/17	Letter from Hooper to Reynolds	
34				01/20/17	Letter from Hooper to Minns	
35				03/27/13	Email from Gillis to Glover	B&T_000344 – B&T_000351
36					Lisa Jude Letter	Pursley-001132
37				04/26/10	Agreement for Sale of Limited Partnership or Assets of Partnership	CIV-LIT-000308 – CIV-LIT-000351
38				06/10/11	Email from Eduard Venerabile to Gillis June 10, 2011	Gillis_0002835
39				08/14/09	Email from Eduard Venerabile to Gillis August 14, 2009	Gillis_00031869 – Gillis_00031881
40				08/04/11	Email from Gillis to Gary Glover August 4, 2011	Gillis_0017290- Gillis_0017291
41				08/30/10	Email from Gillis to Glover and Coughtrey August 30, 2010	Gillis_0018786
42				08/24/10	Email from Gillis to Glover	Gillis_0018790 – Gillis_0018791
43					Mooney Resume	Gillis_0019869
44				08/05/09	Email from Gillis to 5gloves@ozemail.com.au	Gillis_0020835
45				07/24/09	Email from Gillis to 5gloves@ozemail.com.au	
46				08/14/13	Email from Gillis to Coughtrey	Gillis_00048538
47				06/21/12	Email from Pursley to Andrew Mellor	IOMFTL- GPC-0003-000293
48				06/30/09	Email from Gillis to Mooney and Pursley	IRGP0001372
49				06/27/07	Email from Mellor to trcsalazar@fnslaw.com.oh	IRGP0002824
50				06/20/07	Email from Mooney to Nigel Tebay	IRGP0002848
51				06/25/07	Email from Mooney to Nigel Tebay	IRGP0002850
52				08/02/09	Email Gillis to 5gloves@ozemail.com.au	Gillis_00031635- Gillis_00031626
53				07/06/07	Email from Mooney to Pursley	IRGP0003394
54				05/10/11	Email from Gillis to Pursley and Mooney	Gillis_00029971 – Gillis_00029972
55				05/31/18	Tom Foster Interview Recording	B&T_000368
56				06/04/13	Email from Gillis to Venerabile	Gillis_0001497

DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
57				07/10/13	Letter from Mooney to Gillis	MA_00038604
58				02/22/12	Email from Gillis to Venerable	UHY.SYD-001237
59				12/21/12	Email from Pursley to Nelson	B&T 000010
60				12/21/12	Email from Mooney to Pursley	B&T 000011
61				08/14/01	Letter from Venerable to The Directors of Dutton Limited	IRGP0004466 – IRGP0004476
62				04/10/13	Option Contract for the sale of shares in APHC	B&T_000012 – B&T_000014
63				01/24/16	Email from Gillis to Slogar	B&T_000015 – B&T_000017
64				07/28/09	Email from Pursley to Gillis	Gillis_00047286 – Gillis_00047292
65				07/30/09	Gillis Letter to Directors of Southeastern Shipping Company Limited	Gillis_00020803 – Gillis_00020804
66				10/29/09	Gillis letter to Pursley re opinion re Federal Income Tax Consequences	Gillis_00020279- Gillis_00020290
67				11/26/18	Declaration of Susan English [ECF 61]	MA_00037294- MA_00037295
68					IRS Refund Check	MA_00037296
69				06/05/09	RPLP Certificate of Formation	TX-SOS-0000282 – TX-SOS-0000283
70				08/27/09	APHC Resolution of Directors	GILLIS_00020426
71				09/14/12	Email from Venerable to Glover and Gillis	B&T_000018 – B&T_000022
72				08/21/12	Email from Venerable to Gillis	Gillis_0049471 – Gillis_0049472
73				04/19/13	Email from Venerable to Glover	B&T_000352 B&T_000365
74				07/25/10	Letter from Gillis to SES Directors	IOMFTL-GPC-0014- 000023- IOMFTL-GPC-002- 0011
75					SA Caivano handwritten notes	
76				02/05/19	Order [ECF 70]	
77					Email from Mooney to Salazar	007677-007679
78				04/10/12	Email from Mellor to Gillis	IOMFTL-GPC-0014- 000023 IOMFTL-GPC-0014- 000025
79				07/30/09	Letter from Venerable to Directors of SES	PURSLEY-002561- PURSLEY-00252
80				00/00/05	Business Development Agreement	MA_00037297- MA_00037300
81				05/06/05	Email from Sholem to Pursley	MA_00037301- MA_00037305
82				09/09/05	Email from Shuman to Pursley	MA_00037306
83				03/13/06	Email from Shuman to Pursley	MA_00037307
84				08/07/07	Email from Shuman to Pursley	MA_00037308
85				09/05/08	Email from Pursley to Shuman	MA_00037309- MA_00037310
86				10/23/08	Email from Pursley to Shuman	MA_00037311
87				11/07/07	Email from Pursley to Shuman	MA_00037312
88				02/01/12	Email from Venerable to Gillis and Mellor	B&T_000023 – B&T_000024
89				04/10/12	Email from Venerable to Mellor and Gillis	B&T_000025 – B&T_000027
90				10/24/11	Email from Pursley to Bratcher	BMA-0000229
91				06/14/13	Email from Bratcher to Pursley	BMA-0000583

DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
92				10/21/11	Email from Richman to Bratcher	BMA-0000585
93				09/30/10	Email from Bratcher to Pursley	
94				08/13/12	Email from Venerabile to Gillis and Coughtrey	B&T_000028 – B&T_000029
95				11/08/12	Email from Venerabile to Gillis and Mellor	B&T_000030 – B&T_000032
96				01/17/13	Stoneworth Financial Letter	B&T_000033 – B&T_000036
97				01/26/13	Email from Bratcher to Richman	Bratcher-0004991
98				01/24/13	Email from Bratcher to Richman	Bratcher-0004992
99				06/29/12	APHC Cover Letter to UHY re Financial Report YE June 30 2011	B&T_000037
100				unknown	APHC Director's Declaration	B&T_000038
101				01/26/13	Emails from Bratcher to Richman and Salinas	MA_00037325- MA_00037326
102				09/30/10	Email from Bratcher to Pursley	MA_00037327
103				04/19/13	Email from Eduard Venerabile to Glover	B&T_000039 – B&T_000046
104				02/23/12	Email from Bratcher to Pursley and Salinas	MA_00037330
105				10/16/13	Emails from Bratcher to Richman and Salinas	MA_00037325- MA_00037326
106				05/04/18	Townsend email to Listserv	B&T_000369 – B&T_000370
107				04/20/12	Humphries email to Pursley Steve and Tracy	MA_00037335 – MA_00037336
108				04/23/13	Bratcher email to Pursley	
109				11/11/11	Email from Richman to Pursley	MA_00037338
110				07/19/11	Email Pursley to Salinas	MA_00037339
111					INTENTIONALLY LEFT BLANK	
112				07/12/09	July 2009 Draft Gillis Memo to Pursley re Opinion on Qualified Dividend	MA_00001856 – MA_00001873
113				12/03/14	Mooney v Gillis Original Petition	Gillis_0000083 – Gillis_0000085
114				02/27/15	Plaintiff's Notice of Non-Suit	CIV-LIT-000564- CIV-LIT-000566
115				01/19/15	Mooney's Response to Defendant's Request for Disclosure	MA_00001564- MA_00001567
116				08/15/12	APHC Circular Resolutions of Directors	B&T_000047
117					Promissory Note Between Pursley Interest and 4-7s	Bratcher-0001791- Bratcher-0001793
118				07/01/10	Promissory Note between Arosa & IRGP	Bratcher-0000436
119				01/15/11	Promissory Note between Recruitment Partners & Four Sevens Investment Corp	Bratcher-0001796- Bratcher-0001798
120				06/07/10	Promissory Note between Pursley Interest LLC & Four Sevens Investment Corp	000895-000897
121				01/13/10	Promissory Note between Recruitment Partners LP and Four Sevens Investment Corp	000923-000925
122				11/19/09	Promissory Note between Recruitment Partners, LP and Four Sevens Investment Corp	000963-000965
123				11/19/09	Promissory Note Recruitment Partners & Four Sevens	Bratcher-0019314- Bratcher-0019316
124				08/31/11	Promissory Note Recruitment Partners & Four Sevens Investment	Bratcher-0019309- Bratcher-0019310

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125				07/11/16	Email from Colleen Prince Steve Pursley	MA_00037358- MA_00037360
126					Rental Property Dashboard	MA_00037361- MA_00037362
127					2014 Vacasa Tax Docs Attached	MA_00037363
128				07/21/17	Email from Dana Macik to Pursley	MA_00037365
129					Welcome Package	MA_00037366- MA_00037368
130					Four Sevens Profit Scenario	MA_00037369
131				12/21/12	Email from Pursley to Agee, Betzer and Harris	B&T_000048
132				07/19/12	Email from Venerabile to Gillis and Glover	B&T_000049- B&T_000050
133				10/01/09	Pursley Memorandum to Mooney re Progress Report and Advisement	IRGP0005658
134				07/25/10	Letter from Gillis to IOMA attaching minutes	B&T_000051- B&T_000057
135					Jack Townsend Blog	MA_00037370- MA_00037393
136				03/00/14	Ruling Submission Request submitted by Cantrell & Cantrell	B&T_000058- B&T_000206
137				09/14/11	Email from Mooney to Pursley	MA_00037494
138				08/26/11	Email from Mooney to Pursley	MA_00037493
139				05/26/11	Email from Clint Brown to Pursley	MA_00037492
140				05/20/11	Email from David Johnson to Pursley	MA_00037491
141				01/20/09	Email from Mooney to Pursley	MA_00037490
142				12/01/08	Email from Pursley to Mooney	MA_00037487- MA_00037489
143				11/14/08	Email from Mooney to Pursley	MA_00037485- MA_00037486
144				11/05/08	Email from Pursley to Mooney	MA_00037484
145				09/04/08	Email from Mooney to Pursley	MA_00037483
146				09/01/08	Email from Mooney to Pursley	MA_00037482
147				07/07/08	Email from Pursley to Mooney	MA_00037481
148				06/27/08	Email from Mooney to Pursley	MA_00037480
149				02/20/08	Email from Boone to Mooney	MA_00037479
150				02/03/08	Email from Mooney to Boone	MA_00037478
151				01/24/08	Email from Mooney to Pursley	MA_00037477
152					Schrader Westchester Real Estate File	B&T_000207- B&T_000220
153					Jim Miceli real estate file	B&T_000221- B&T_000254
154				01/02/08	Email from Mooney to Boone and Pursley	MA_00037474
155				12/18/07	Email from Mooney to Boone and Pursley	MA_00037472- MA_00037473
156				12/14/07	Email from Mooney to Pursley	MA_00037470- MA_00037471
157				12/04/07	Email from Mooney to Boone and Pursley	MA_00037468- MA_00037469
158				11/29/07	Email from Mooney to Pursley	MA_00037467
159				00/00/03	Strategic Negotiation Planning for Acquisition	MA_00037394- MA_00037416
160					Agreement Gulf States and The Westchester Group Inc	MA_00037417- MA_00037418
161				04/07/99	Melnik letter to IOMFL	BL-IOMFTL FILE 1-000336
162				10/25/07	Email from Kevin Weldon to Mooney	MA_00037466

DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
163					The Offshore Money Manual	B&T_000255 – B&T_000257
164				04/14/10	Addendum to Agreement for Sale of Limited Partnership or Assets	B&T_000258
165				06/30/09	Amendment and Revision to RPLP Limited Partnership Agreement	B&T_000259 – B&T_000267
166				04/01/07	Email from Shetter to Mooney	B&T_000268
167				01/20/14	Cantrell letter to Hooper	B&T_000269 – B&T_000270
168				01/28/10	Email from Mooney to Pursley	B&T_000271
169				01/28/10	Email from Mooney to Gillis	B&T_000272
170				04/25/06	Email from Shetter to Mooney	B&T_000273
171				10/03/05	Email from Shuman to Pursley	B&T_000274
172				06/30/10	Southeastern Shipping Company Limited Summarized Profit and Loss Account for the YE 30 June 2010	MA_00007421 – MA_00007422
173				05/10/11	Glover Memorandum to Gillis	MA_00007439 – MA_00007441
174					INTENTIONALLY LEFT BLANK	
175				02/26/06	Email from Shetter to Mooney	Disco ID 124511-1
176				10/01/13	Cantrell letter to Hooper	B&T_000275
177				01/03/14	Hooper letter to Nelson	B&T_000276 – B&T_000278
178				12/24/18	Letter from IRS	B&T_000279 – B&T_000281
179				01/21/10	Email from Gillis to Mooney	B&T_000282 – B&T_000285
180				08/26/10	Email from Mooney to Parkhill	B&T_000286 – B&T_000287
181				06/02/09	Email from Markley to Gillis	B&T_000288
182				05/21/09	Email from Markley to Gillis	B&T_000289 – B&T_000291
183				05/11/09	Email from Markley to Gillis	B&T_000292 – B&T_000296
184				10/08/09	Email from Markley to Gillis	B&T_000297
185				09/28/09	Email from Markley to Gillis	B&T_000298
186				09/24/09	Email from Markley to Gillis	B&T_000299 – B&T_000305
187				08/20/09	Email from Markley to Gillis	B&T_000306
188				09/07/10	Email from Markley to Gillis	B&T_000307 – B&T_000308
189				09/07/10	Email from Markley to Hodson	B&T_000309 – B&T_000310
190				01/25/10	Email from Mooney to Gillis	B&T_000311 – B&T_000312
191				01/28/10	Email from Mooney to Gillis	B&T_000313 – B&T_000314
192				02/10/10	Email from Mooney to Gillis	B&T_000315
193				03/04/10	Email from Mooney to Gillis	B&T_000316
194				03/04/10	Email from Mooney to Gillis	B&T_000317
195				03/05/10	Email from Mooney to Gillis	B&T_000318 – B&T_000320
196				06/16/10	Email from Mooney to Gillis	B&T_000321 – B&T_000322
197				06/28/10	Email from Mooney to Gillis	B&T_000323 – B&T_000324
198				06/28/10	Email from Mooney to Gillis	B&T_000325
199				08/21/10	Email from Mooney to Gillis	B&T_000326 – B&T_000327

DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
200				07/16/10	Email from Mooney to Gillis	B&T_000328
201				07/19/10	Email from Mooney to Gillis	B&T_000329 – B&T_000330
202				07/28/10	Email from Mooney to Gillis	B&T_000331 – B&T_000332
203				03/16/11	Email from Mooney to Gillis	B&T_000333
204				07/14/09	Email from Mooney to Gillis	B&T_000334 – B&T_000335
205				07/16/09	Email from Mooney to Gillis	B&T_000336
206				09/30/08	Email from Pursley to Mooney	B&T_000337
207					INTENTIONALLY LEFT BLANK	
208				06/30/09	Email from Pursley to Agee, Betzer and Harris	B&T_000338
209				10/21/11	Email from Richman to Bratcher	MA_00037607 – MA_00037609
210				12/19/12	Email from Richman to Mooney	B&T_000339 – B&T_000341
211				10/25/11	Email from Richman to Pursley	B&T_000342
212				02/24/16	England letter to Pursleys	England-01413
213					Statement Regarding Related Party Advances	England-01544
214				01/25/13	Email from Bratcher to Richman	MA_00037341 – MA_00037342
215				01/10/13	Email from Richman to Salinas	MA_00037343 – MA_00037345
216				07/10/09	Gillis Memorandum	IRGP0006113 - 6141
217					Handwritten Notes	B&T_000343
218				03/02/11	Email from Pursley to Salinas	MA_00037350 – MA_00037351
219				02/01/10	Email from Pursley to Bratcher	MA_00037353
220				05/30/12	Richman Memorandum to Pursley	MA_00037357
221				08/27/15	Check to Infinisource	B&T_000366
222				11/04/15	Check to Infinisource	B&T_000367
223					As Amended Form 5471	IRS-0006835 – IRS-0006846
224				05/09/11	Pursley email to Shuman	B&T_000371 - B&T_000372
225					Sandy Creek Ranch – Valuation Summary	B&T_000373
226				08/24/14	Mooney v Pursley (Harris County, 2014-44623) Plaintiff's Original Petition and Request for Disclosure	B&T_000374 - B&T_000406
227				12/28/18	Pursley v Mooney v RPLP and IRC (Harris County; 2017-282294) Plaintiff's Sixth Amended Original Petition	B&T_000407 - B&T_000453
228				07/29/11	Salinas email to Pursley attaching general ledgers	B&T_000454 - B&T_000489
229				10/04/11	Salinas email to Pursley attaching Bookkeeping	B&T_000490
230				03/20/10	Salinas email to Pursley	B&T_000762
231				03/22/10	Salinas email to Pursley	B&T_000763
232				03/11/11	Salinas email to Pursley	B&T_000765
233				03/02/15	Pursley email to England	B&T_000766
234				05/12/15	Pacheco email to Pursley	B&T_000767
235				07/09/15	Christmann email to Pursley	B&T_000768
236				10/01/15	Pursley email to Christmann	B&T_000769
237				02/11/13	Nguyen email to Pursley	B&T_000771
238				09/01/12	Vinarco, IRC, RPLP and Westoceanic Contribution and Purchase Agreement	B&T_000790

DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
239				12/31/12	Mooney Fraud Risk Inquiries Form	B&T_000863
240				12/31/10	Mooney Fraud Risk Inquiries Form	B&T_000866
241					Handwritten notes	B&T_000869
242				11/04/09	Gillis email to Pursley and Mooney	Gillis_00031417
243				02/27/15	Mooney v Gillis (Harris County; 2014-70310) Order	
244				02/05/15	Pacheco email to Pursley	B&T_000886 - B&T_000894
245				04/21/14	APHC DeRegistration	AUS-SEC-COMM-000055
246				12/31/10	RPLP Audited Financial Statements	Bratcher-0011318
247				12/31/11	RPLP Audited Financial Statements	Bratcher-0018187
248				12/31/12	RPLP Audited Financial Statements	Bratcher-0021576
249				12/31/12	Mooney Fraud Risk Inquiries Form	Bratcher-0021550
250				12/01/11	Stoneworth Financial, LLC letter to Pursley	Bratcher-0021635
251					American Real Estate Properties and Pursley Interests Agreement for Participating Interest	Bratcher-0005056 SC-5
252				08/17/10	Pursley email to Bratcher	SC-9
253				09/03/09	APHC Meeting Minutes	CG-8 UHY.SYD-000429
254				05/10/09	Foster Memorandum to Pursley	FOSTER-000019 Gov. Ex. 001-035
255				07/30/09	Venerable letter to Coughtrey	Gillis_00031613 Gov. Ex. 001-045
256				02/02/12	Mellor email to Pursley	IOMFTL-GPC-003-000124 Gov. Ex. 003-005
257				10/31/12	Pursley email to Mellor	IOMFTL-GPC-004-000180 Gov. Ex. 003-020
258				08/06/12	Venerabile email to Mellor	BL-FILE 2-000027 Gov. Ex. 005-037
259				04/17/09	Foster email to Pursley	IRGP0000024 Gov. Ex. 008-001
260				02/03/10	Pursley email to Bratcher	MA_00037355 - MA_00037356
261				04/29/09	Foster fax to Pursley	IRGP0000095 - IRGP0000101
262				04/24/09	Foster Invoices	Foster-000111 - Foster-000116
263				04/24/09	Foster Memorandum to Pursley	IRGP0000052 - IRGP0000053 Gov. Ex. 008-013
264				05/07/09	Foster Memorandum to Pursley	MA_00032751 Gov. Ex. 008-016
265				05/07/09	Gillis email to Pursley	MOONEY-000126 - MOONEY-000127 Gov. Ex. 009-105
266				09/00/01	Account Opening Documents for SES Account	RBS/ESC5-001444-1 Gov. Ex. 013-001
267				00/00/07	2007 Form 1040X Amended Individual Tax Return - S. Mooney	IRS-0006668 - IRS-0006720 Gov. Ex. 017-069
268				08/29/07	SES Fax to IOMA / Mellor	IRGP0003117 - IRGP0003118
269				09/20/01	SES Share Certificates	IRGP0004588 - IRGP0004592
270				04/25/09	Pursley email to Mooney	IRGP0005946 - IRGP0005948
271				09/00/01	SES Corporate Records	IRGP0006713 - IRGP0006812

DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
272				08/25/10	Webb email to Pursley	MA_00038483
273				12/01/10	Mercer email to Pursley	MA_00038512
274				09/11/13	Buschholtz email to Pursley	MA_00038504
275					IRC Marketing Document	B&T_000870
276					Steve Mooney Travel History Excel	
277					Steve Mooney TECS 5pp.	
278					Steve Mooney Travel History 2pp.	
279					Steve Mooney Travel Documents List	
280					David Melnick Travel History Excel	
281					David Melnick TECS i94 Result List 2pp.	
282					David Melnick TECS 34pp.	
283					Shaun Mooney TECS Report 10pp.	Gov. Ex. 163
284					Steve Pursley TECS Report 9pp.	Gov. Ex. 164
285				08/23/14	Venerable email to Pursley	B&T_000871
286				03/03/10	Shetter email to Mooney, et al.	B&T_000872 - B&T_000877
287				03/10/10	Shetter email to Mooney, et al.	B&T_000878
288				03/06/11	Mooney email to Shetter, Steve Mooney, et al.	B&T_000879 - B&T_000880
289				02/05/08	Stephen Mooney email to Shaun Mooney	B&T_000881
290				08/17/10	Pursley email to Bratcher	B&T_000882 - B&T_000885
291				05/28/09	Ratification and Indemnification of Corporate Actions of SES for the Formation and Ownership of Pehlambridge Limited	Pursley-000230
292				06/21/11	Venerable email to Mellor	BL-FILE 2-000017
293				08/04/09	Gillis Memorandum to Coughtrey	IRGP0001802
294				00/00/02	IRS Interest Calculator 2002 FSI	B&T_000895
295				00/00/03	IRS Interest Calculator 2003 FSI	B&T_000897
296				00/00/04	IRS Interest Calculator 2004 FSI	B&T_000899
297				00/00/05	IRS Interest Calculator 2005 FSI	B&T_000901
298				00/00/06	IRS Interest Calculator 2006 FSI	B&T_000903
299				00/00/07	IRS Interest Calculator 2007 FSI	B&T_000905
300				00/00/07	IRS Interest Calculator 2007 Rep Div	B&T_000907
301				00/00/08	IRS Interest Calculator 2008 FSI	B&T_000909
302				00/00/08	IRS Interest Calculator 2008 Rep Div	B&T_000911
303				00/00/09	IRS Interest Calculator 2009 FSI	B&T_000913
304				00/00/09	IRS Interest Calculator 2009 Rep Div	B&T_000915
305				00/00/10	IRS Interest Calculator 2010 FSI	B&T_000917
306				00/00/10	IRS Interest Calculator 2010 NPT Div	B&T_000919
307				00/00/10	IRS Interest Calculator 2010 Rep Div	B&T_000921
308				00/00/11	IRS Interest Calculator 2011 FSI	B&T_000923
309				00/00/11	IRS Interest Calculator 2011 Rep Div	B&T_000925
310					Interest and Penalty Calcs.xlsx	B&T_000927
311					Historical currency converter with official exchange rates from	B&T_000928
312					IRS-002024 penalty computation	B&T_000929
313				06/30/10	Australian Ptrs 6-30-2010	B&T_000932
314					Penalty Computation	B&T_000941
315					Penalty Computation.xlsx	B&T_000942
316				00/00/02	2002 As filed	B&T_000943
317				00/00/03	2003 As filed	B&T_000957
318				00/00/04	2004 As filed	B&T_000966
319				00/00/05	2005 As filed	B&T_000980
320				00/00/06	2006 As filed	B&T_000991

DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
321				00/00/07	2007 As filed	B&T_001015
322				00/00/08	2008 As filed	B&T_001045
323				00/00/09	2009 As filed	B&T_001066
324				00/00/10	2010 As filed	B&T_001090
325				00/00/11	2011 As filed	B&T_001132
326				00/00/02	2002 Repatriated Dividend Income with Form 5471	B&T_001182
327				00/00/03	2003 Repatriated Dividend Income with Form 5471	B&T_001212
328				00/00/04	2004 Repatriated Dividend Income with Form 5471	B&T_001237
329				00/00/05	2005 Repatriated Dividend Income with Form 5471	B&T_001267
330				00/00/06	2006 Repatriated Dividend Income with Form 5471	B&T_001294
331				00/00/07	2007 Form 1040X Repatriated Dividend Income	B&T_001325
332				00/00/07	2007 Repatriated Dividend Income with Form 5471	B&T_001354
333				00/00/08	2008 Form 1040X Repatriated Dividend Income	B&T_001389
334				00/00/08	2008 Repatriated Dividend Income with Form 5471	B&T_001409
335				00/00/09	2009 Form 1040X Repatriated Dividend Income	B&T_001440
336				00/00/09	2009 Repatriated Dividend Income with Form 5471	B&T_001467
337				00/00/10	2010 Form 1040X Repatriated Dividend Income	B&T_001498
338				00/00/10	2010 Repatriated Dividend Income with Form 5471	B&T_001542
339				00/00/11	2011 Form 1040X Repatriated Dividend Income	B&T_001592
340				00/00/11	2011 Repatriated Dividend Income with Form 5471	B&T_001642
341				00/00/02	2002 1040X FSI Other Income	B&T_001698
342				00/00/02	2002 FSI Income (02-11)	B&T_001712
343				00/00/03	2003 1040X FSI Other Income	B&T_001745
344				00/00/03	2003 FSI Income (02-11)	B&T_001754
345				00/00/04	2004 1040X FSI Other Income	B&T_001782
346				00/00/04	2004 FSI Income (02-11)	B&T_001797
347				00/00/05	2005 1040X FSI Other Income	B&T_001831
348				00/00/05	2005 FSI Income (02-11)	B&T_001843
349				00/00/06	2006 1040X FSI Other Income	B&T_001874
350				00/00/06	2006 FSI Income (02-11)	B&T_001899
351				00/00/07	2007 1040X FSI Other Income	B&T_001932
352				00/00/07	2007 FSI Income (02-11)	B&T_001961
353				00/00/08	2008 1040X FSI Other Income	B&T_001998
354				00/00/08	2008 FSI Income (02-11)	B&T_002018
355				00/00/09	2009 1040X FSI Other Income	B&T_002051
356				00/00/09	2009 FSI Income (02-11)	B&T_002078
357				00/00/10	2010 1040X FSI Other Income	B&T_002110
358				00/00/10	2010 FSI Income (02-11)	B&T_002154
359				00/00/11	2011 1040X FSI Other Income	B&T_002204
360				00/00/11	2011 FSI Income (02-11)	B&T_002256
361				00/00/04	2004 1040X FSI Inc & NPT Div (04-11)	B&T_002314
362				00/00/04	2004 FSI Inc & NPT Div (04-11)	B&T_002329
363				00/00/05	2005 1040X FSI Inc & NPT Div (04-11)	B&T_002363
364				00/00/05	2005 FSI Inc & NPT Div (04-11)	B&T_002375
365				00/00/06	2006 1040X FSI Inc & NPT Div (04-11)	B&T_002406
366				00/00/06	2006 FSI Inc & NPT Div (04-11)	B&T_002431
367				00/00/07	2007 1040X FSI Inc & NPT Div (04-11)	B&T_002464

DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DATE OF EXHIBIT	DESCRIPTION OF EXHIBIT	BATES RANGE
368				00/00/07	2007 FSI Inc & NPT Div (04-11)	B&T_002493
369				00/00/08	2008 1040X FSI Inc & NPT Div (04-11)	B&T_002530
370				00/00/08	2008 FSI Inc & NPT Div (04-11)	B&T_002551
371				00/00/09	2009 1040X FSI Inc & NPT Div (04-11)	B&T_002584
372				00/00/09	2009 FSI Inc & NPT Div (04-11)	B&T_002617
373				00/00/10	2010 1040X FSI Inc & NPT Div (04-11)	B&T_002649
374				00/00/10	2010 FSI Inc & NPT Div (04-11)	B&T_002693
375				00/00/11	2011 1040X FSI Inc & NPT Div (04-11)	B&T_002743
376				00/00/11	2011 FSI Inc & NPT Div (04-11)	B&T_002795
377					Additional tax liability foreign source income	B&T_002854
378					Computation of Additional Tax Due and Owing SM - OVDP 2012 - FSI	B&T_002855
379					Computation of Additional Tax Due and Owing SM - OVDP 2012 - Repatriated Income	B&T_002856
380					OVDP Penalty Computation	B&T_002857
381					Tax Interest and Penalty Paid by Shaun Mooney with OVDP	B&T_002858
382					Schedule J computation worksheet	B&T_002859
383					Summary of Tax Liabilities on Foreign Income Tabbed Versions - 8-19-13 Int date.xlsx	B&T_002860

Defendant reserves the right to amend its exhibit list as needed prior to and during trial.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on August 21, 2019, a copy of this document was served on all counsel. I further certify that on August 22, 2019, a copy of this document was filed with the court and all counsel of record through filing on the ECF System.

/s/ Victor D. Vital _____
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